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*Attorneys for Pixxles LTD, Donald Kasdon, Amber Fairchild, Debra King*

**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

IBUUMERANG, LLC, a Texas limited liability  
 company,

Plaintiff,

vs.

T1 PAYMENTS LLC, a Nevada limited  
 liability company; T1 PAYMENTS  
 LIMITED, a United Kingdom private limited  
 company; TGLOBAL SERVICES LIMITED,  
 a United Kingdom private limited company;  
 DONALD KASDON, an individual; DEBRA  
 KAREN KING aka DEBRA KAREN  
 KASDON, an individual; AMBER  
 FAIRCHILD, an individual; PAYVISION  
 B.V., a Netherlands limited company; and  
 PIXXLES, Ltd., a United Kingdom private  
 limited company

Defendants.

CASE NO. 2:21-cv-01611-JCM-VCF

**UNOPPOSED/CONSENT MOTION  
 REGARDING DEADLINES TO FILE  
 MOTIONS TO DISMISS AND REPLY  
 IN SUPPORT THEREOF TO  
 IBUUMERANG, LLC'S FIRST  
 AMENDED COMPLAINT [ECF No. 9]**

**[Special Appearance Only]**

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Having obtained plaintiff Ibuumerang, LLC's consent: (1) defendants Donald Kasdon, Amber Fairchild, and Debra King ("Individuals") request that the Court allow them to respond to Ibuumerang's First Amended Complaint (ECF No. 9, "FAC") by no later than February 22, 2022; and (2) allow specially-appearing defendant Pixxles Ltd.<sup>1</sup> to file its reply to Ibuumerang's opposition to Pixxles Ltd.'s motion to dismiss also by no later than February 22, 2022.

Good cause exists to grant the requested extensions. Pixxles timely filed its motion to dismiss, and Ibuumerang filed its opposition to the motion to dismiss on February 4, 2022, setting Pixxles' deadline to submit its reply brief as February 11, 2022. (ECF Nos. 34, 38.) Pixxles and the Individuals now request a modest extension to file Pixxles' reply in support of its motion to dismiss and the Individuals' motions to dismiss because Pixxles and the Individuals are represented by the same counsel, all four briefs are due on the same day, and the parties are additionally discussing resolution of some or all of the claims. This is Pixxles' second unopposed request for a modest extension and the Individuals' first unopposed request for an extension; this request is not made for purposes of undue delay; and there are no pretrial or trial deadlines. Additionally, Ibuumerang consents to the requested extension.

THEREFORE, defendants Donald Kasdon, Amber Fairchild, and Debra King ("Individuals") request that the Court allow them to respond to Ibuumerang's First Amended Complaint (ECF No. 9, "FAC") by no later than February 22, 2022; and (2) allow specially-appearing defendant Pixxles Ltd. to file its reply to Ibuumerang's opposition to Pixxles Ltd.'s motion to dismiss also by no later than February 22, 2022.

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<sup>1</sup> Pixxles Ltd. files this motion through a special appearance because it contests that Nevada courts may exercise personal jurisdiction over it. Thus, by filing this motion, Pixxles does not consent to the personal jurisdiction of the Court or waive any defenses. Pixxles moved to dismiss for lack of personal jurisdiction and failure to state a claim (ECF No. 34).

1 DATED: February 7, 2022

By: /s/ Kory L. Kaplan

**KAPLAN COTTNER**

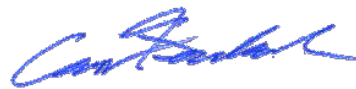
Kory L. Kaplan, Esq.

**VENABLE LLP**

Ari N. Rothman, Esq.

*Counsel for Donald Kasdon, Amber Fairchild,  
Debra King and Pixxles Ltd.*

11 IT IS SO ORDERED.

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13 Cam Ferenbach

14 United States Magistrate Judge

15 DATED 2-14-2022

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 7th day of February, 2022, a copy of the foregoing was filed electronically via the Court's CM/ECF system. Pursuant to Local Rule 5.5(h), notice of filing will be served on all parties by operation of the Court's CM/ECF system, and parties may access this filing through the Court's CM/ECF system.

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/s/ Allison Hardy

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